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EX PARTE OR LATE FILED

February 19, 1997

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street NW - Room 222
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Ex Parte Presentation
CC Docket No. 95-116

Dear Mr. Caton:

Please be advised that Richard Wolf, Robert Wineski, and George Strom of Illuminet, Inc., and its counsel, Stephen G. Kraskin and Sylvia Lesse of Kraskin & Lesse, LLP, participated in a conference call today with the following members of the Commission's staff:

- Chris Barnekov
- Lloyd Collier
- Neil Fried
- Vaikunth Gupta
- Linda Kinney
- John Scott
- Lenworth Smith
- Jeannie Su

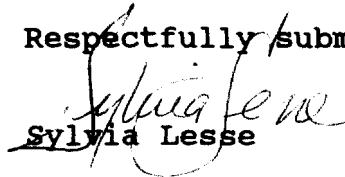
The discussion was initiated by staff to discuss elements of Illuminet's February 6, 1997 ex parte presentation regarding issues raised in this docket. The information provided with notification of that meeting, together with the attached synopsis of today's discussion, reflect the substance of the presentation.

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Pursuant to Section 1.1206(a)(1) of the Commission's Rules, two copies of this *ex parte* notice are being filed with the Office of the Secretary today. Please include this notice in the public record of the above-referenced proceeding.

Respectfully submitted,


Sylvia Lesse

cc (with attachments):

Chris Barnekov
Lloyd Collier
Neil Fried
Vaikunth Gupta
Linda Kinney
John Scott
Lenworth Smith
Jeannie Su

Signal Transfer Points (STPs) provide signaling services to the underlying carrier switching systems called SSPs. The SSP and STP signaling network uses Signaling System # 7 (SS7) to communicate for rapid call set-up (using ISDN User Part or ISUP) and for SSP access to database functionality via Transaction Capability (TCAP), such as 800 services. STPs are designed from the board-level up, including the operating system, back plane, and application, for efficient high throughput packet switching and Global Title Translation (GTT). Efficient and high throughput routing is required both for call set-up services (ISUP) and database access (TCAP). The GTT function provides an association with the Calling/Called party ID and the Destination Point Code which is the address of a TCAP application, another STP, or an SSP.

The GTT function designed into STPs is exactly the same functionality required for Local Number Portability (LNP) Location Routing Network (LRN) and LNP GTT functionality. Specifically, in LNP, the called number must be associated with an LRN address or, for TCAP services, with the Destination Point Code via GTT function. This LNP functionality is commonly referred to as Service Control Point (SCP) functionality. Historically, the SCP function has been implemented in out-board databases which have also been called SCPs. However, the database functionality can be integrated into the STP or even into the SSP. For high throughput shared database intensive functions, the SCP functionality is located either in STPs or SCPs. For LNP implementations, both STP resident and SCP resident deployments are available.

STP and SCP physical implementations have benefits and drawbacks. Illuminet has evaluated both alternative physical implementations of the SCP functionality and has concluded that the STP approach is most cost effective for LNP. STPs have higher capacities in terms of Transactions Per Second (TPS) as well as reduced link costs. SCP implementations of LNP are more flexible in that they provide for the ability to serve as platforms for other Intelligent Network (IN) services, but this flexibility comes with a trade-off in that the SCP has significantly lower TPS than an STP. Also, the cost of an SCP is typically two times that of an STP. Lastly, with the volumes required for LNP, the SCP implementation will almost always be dedicated for LNP service. (For Illuminet, our volumes, which are significantly below that of an RBOC, would have required multiple stand-alone SCPs to handle the LNP traffic volumes, would Illuminet have adopted the SCP approach.)

Figure 10 of the Illuminet Ex Parte Presentation to the FCC on February 6, 1997 illustrates the benefits of the STP approach. From a TPS perspective, the STP is able to handle more than 10,000 LNP TPS while typical SCPs are able to handle under 1,000 TPS. Hence, to service the same volume of LNP transactions, roughly 11 SCPs would be required versus the single mated pair of STPs (Note: This graphic and data was issued publicly by Tekelec, one of Illuminet's STP vendors). In addition, in physically separate SCP implementations, transmission facilities between the non-LNP capable STPs and the SCPs are required, significantly adding to the cost of LNP implementations. This is shown on the left hand side of page 10. In contrast, STP implementations reduce the cost of deploying LNP. Fewer STP entities are required (compared to the number of SCPs) since the TPS is an order of magnitude higher. Also, since the LNP functionality is located within the STP, there is no need for transmission facilities. Access to the LNP application occurs internal to the STP on the back plane.

As shown in Figure 5 of the Illuminet Ex Parte Presentation to the FCC, carriers will have alternatives in how to most efficiently deploy LNP services. Shown on the left side of Figure 5, the larger carriers (referred to above) will deploy their own solution. Some carriers may deploy their own LNP dip capability but not deploy the database management services (Local Service Management System or LSMS). The multitude of carriers will look to Illuminet (or other third party providers), for a complete LNP solution, as shown on the right picture in Figure 5.

Illuminet has committed to deliver cost effective LNP solutions to the carrier community including ITCs, CLECs, and wireless carriers within the time-frame mandated by the FCC. Our target market includes all carriers who are not large enough to afford deployment of internal LNP solutions. (To date, Illuminet is aware of only a hand-full of carriers who have committed to internal deployment: the RBOCs, GTE, MFS,

AT&T, MCI, and Sprint). Our current base of over 1000 ITCs, CLECs and wireless carriers will look to Illuminet for a cost-effective LNP solution compared with an internal deployment of LNP functionality.